

**UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
PORTLAND DIVISION**

UNITED STATES OF AMERICA

3:22-cr-00285-MO

v.

INFORMATION

CHASITY COOPER,

26 U.S.C. § 7206(1)

18 U.S.C. § 1343

Defendant.

THE UNITED STATES ATTORNEY CHARGES:

INTRODUCTORY ALLEGATIONS

At all times relevant to this Information:

1. Defendant **CHASITY COOPER** was a resident of Tualatin, Oregon.
2. Defendant **COOPER** was employed by All Oregon Landscaping (AOL) as an Office Administrator.
3. As Office Administrator, defendant **COOPER** controlled AOL's database systems, including all passwords and account access information for QuickBooks, which AOL used to pay its employees.
4. As Office Administrator, AOL issued defendant **COOPER** a Citibank Visa credit card to be used solely for business transactions on AOL's behalf.

COUNT ONE
(Wire Fraud)
(18 U.S.C. § 1343)

1. All prior paragraphs of this Information are incorporated herein.

2. Beginning in or about February 2018 and continuing until in or about April 2019, in the District of Oregon, defendant **COOPER** knowingly and intentionally devised and intended to devise a scheme and artifice to defraud as to material matters and to obtain money and property by means of materially false and fraudulent pretenses, representations, promises, and omissions of material facts.

SCHEME AND ARTIFICE TO DEFRAUD

3. It was part of the material scheme and artifice to defraud that defendant **COOPER** accessed AOL's QuickBooks system to issue payroll payments in the names of former AOL employees.

4. It was a further part of the material scheme and artifice to defraud that defendant **COOPER** deposited those payroll payments into bank accounts under her control.

5. It was a further part of the material scheme and artifice to defraud that defendant **COOPER**, in some instances, altered the paid date in AOL's database systems to conceal her fraud.

6. It was further part of the material scheme and artifice to defraud that defendant **COOPER** used or instructed others to use defendant **COOPER'S** AOL Citibank Visa credit card to purchase unauthorized gift cards for defendant **COOPER'S** personal use.

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USE OF INTERSTATE WIRE

7. In the District of Oregon and elsewhere, defendant **COOPER**, for the purpose of executing and attempting to execute the aforementioned material scheme and artifice to defraud and to obtain money and property by means of materially false and fraudulent pretenses, representations, promises, and omissions of material facts, as described above, did knowingly cause the transmission by means of wire communication in interstate commerce, certain writings, signs, signals and sounds: to wit, a payroll direct deposit in the name of a former AOL employee in the amount of \$2,928.32, that defendant **COOPER** caused to be transmitted to a financial institution in her name on or about March 8, 2018.

In violation of Title 18, United States Code, Section 1343.

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COUNT TWO
(Knowingly Subscribing to Materially False Tax Returns)
(26 U.S.C. § 7206(1))

1. All prior paragraphs of this Information are incorporated herein.
2. On or about February 4, 2019, in the District of Oregon, defendant **COOPER** willfully made and subscribed a U.S. Individual Income Tax Return, Form 1040, for the calendar year 2018, which was verified by a written declaration that it was made under the penalties of perjury, and which defendant **COOPER** did not believe to be true and correct as to every matter. Specifically, the U.S. Individual Income Tax Return, Schedule 1 (Form 1040), for calendar year 2018, which was filed with the Internal Revenue Service, reported on Line 21 (Other Income) of \$0.00, whereas, as defendant then and there well knew and believed that said item was false, failing to report additional income in the amount of \$204,685.

In violation of Title 26, United States Code, Section 7206(1).

Dated: August 10, 2022.

Respectfully submitted,

NATALIE K. WIGHT
United States Attorney

/s/ Ethan D. Knight
ETHAN D. KNIGHT, OSB #992984
MEREDITH D.M. BATEMAN, OSB #192273
Assistant United States Attorneys